

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

2019 JUN 26 PM 2: 38

2

CRIMINAL NO.

2

INDICTMENT

§

CT 1: 8:1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and (a)(1)(B) (i)- Conspiracy to Smuggle Aliens;

§

**CT 2: 8:1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i) -
Transporting Aliens for Financial Gain;**

§

**CT 3: 8:1324(a)(1)(A)(iii) and (a)(1)(B)(i)-
Harboring Aliens for Financial Gain; and**

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**CT 3: 8:1324(a)(1)(A)(iii) and (a)(1)(B)(i)-
Harboring Aliens for Financial Gain; and**

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CT 4: 8 U.S.C. § 1326(a) – Illegal Re-Entry

38

EP 19 CR2055

COUNT ONE

(8 U.S.C. §§ 1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and (a)(1)(B)(i))

On or about May 23, 2019, and continuing to and including on or about June 5, 2019, in the Western District of Texas, Defendants,

**SONIA ROJAS-ALVAREZ, (1),
IDA ELENA ORTEGON, (2),
RENE MACIAS, JR., (3),
GUADALUPE MANUEL PARRA-MARQUEZ, (4), and
JAVIER MARTINEZ-GONZALEZ, (5)**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with others to the Grand Jury unknown, to commit offenses against the United States, namely: to transport and move and attempt to transport and move aliens within the United States knowing and in reckless disregard of the fact that said aliens had come to, entered, and remained in the United States in violation of law, said transportation being in furtherance of said violation of law,

in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and (a)(1)(B)(i).

COUNT TWO

(8 U.S.C. §§ 1324(a)(1)(A)(ii) and (a)(1)(B)(i))

On or about June 5, 2019, in the Western District of Texas, Defendants,

**SONIA ROJAS-ALVAREZ, (1),
IDA ELENA ORTEGON, (2),
RENE MACIAS, JR., (3),
GUADALUPE MANUEL PARRA-MARQUEZ, (4), and
JAVIER MARTINEZ-GONZALEZ, (5)**

knowing and in reckless disregard of the fact that aliens had come to, entered and remained in the United States in violation of law, transported and moved, and attempted to transport and move such aliens within the United States in furtherance of said violation of law, all done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (a)(1)(B)(i).

COUNT THREE

(8 U.S.C. §§ 1324(a)(1)(A)(iii) and (a)(1)(B)(i))

On or about May 29, 2019, and continuing to and including on or about June 5, 2019, in the Western District of Texas, Defendants,

**SONIA ROJAS-ALVAREZ, (1),
IDA ELENA ORTEGON, (2),
RENE MACIAS, JR., (3),
GUADALUPE MANUEL PARRA-MARQUEZ, (4), and
JAVIER MARTINEZ-GONZALEZ, (5)**

knowing and in reckless disregard of the fact that certain aliens had come to, entered and remained in the United States in violation of law, concealed, harbored, and shielded from detection, and attempted to conceal, harbor, and shield from detection such aliens, all for the purpose of

commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and (a)(1)(B)(i).

COUNT FOUR
(8 U.S.C. § 1326(a))

On or about June 5, 2019, in the Western District of Texas, Defendant,

JAVIER MARTINEZ-GONZALEZ, (5)

an alien, who had previously been excluded, deported, and removed from the United States on or about January 23, 2018, attempted to enter, entered, and was found in the United States, without having previously received express consent to reapply for admission from the United States Attorney General and the Secretary of Homeland Security, the successor pursuant to Title 6, United States Code, Sections 202(3), 202(4) and 557, in violation of Title 8, United States Code, Section 1326(a).

A TRUE BILL
ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002

FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY: _____

Assistant U.S. Attorney